

Puget Soundkeeper<sup>SM</sup> Alliance

Mike Gallagher, PBT Coordinator  
Department of Ecology  
PO Box 47600  
Olympia, WA 98504

Dear Mr. Gallagher:

*Protecting and  
Preserving  
Puget Sound*

I am writing to urge the Department of Ecology to issue a strong Persistent Bioaccumulative Toxins (PBT) Rule. The PBT Program must continue to be a powerful mechanism for protecting public health and the environment by eliminating persistent toxic chemicals in Washington. The PBT rule is an opportunity to show that Ecology remains committed to the goal of significantly reducing PBTs in Washington state by 2020.

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Seattle, Washington  
98107

Specifically, Puget Soundkeeper Alliance supports the following suggestions made by the Toxic-Free Legacy Coalition:

Phone:

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**Include a broad list of chemicals to be phased out.**

All stakeholders, including the public, deserve to know what chemicals are harmful and may be phased out. Also, Washington businesses will be better served by being made aware of chemicals of concern before regulations are put in place.

E-mail:

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**Include phthalates on the list.**

A recent study of persistent toxic chemicals in household dust found exposure levels for phthalates to be the highest among chemicals tested. Studies have shown that phthalates are toxic to the reproductive system and may be linked to asthma, yet we expose ourselves to phthalates daily through body care products that we apply directly on our skin and on our children. The PBT Rule must address phthalates and other reproductive toxins.

**Incorporate the precautionary principle.**

The precautionary principle is a common-sense approach to decision-making in the face of scientific uncertainty. It emphasizes the need to move to safer alternatives when there is potential for serious harm to health or the environment.

**Establish that the goal of chemical action plans is to eliminate the toxic chemical.**


Because chemical action plans are only developed for those chemicals where a problem has been identified, the goal of each plan must be the elimination of the chemical if the program is to be effective.

**Eliminate the exemption for pesticides and fertilizers.**

The exemption for pesticides and fertilizers from the PBT Rule is shortsighted and undermines the effectiveness of the PBT Program. Ecology should immediately request that the Legislature remove the exemption for these dangerous chemicals so that they can be addressed as part of the PBT program.

Thank you for the opportunity to comment on the proposed PBT Rule. A strong rule is critical to the health of both the people and the environment of Washington State.

Sincerely,

  
Sue Joerger

Puget Soundkeeper